

**CORRESPONDENCE
FILE**

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C. 20554**

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Federal Communications Commission
Office of the Secretary

In re) MB Docket No. 04-191
)
San Francisco Unified School District)
)
For Renewal of License for Station KALW(FM),) Facility ID No. 58830
San Francisco) File No. BRED-19970801YA

To: San Francisco Unified School District

**ENFORCEMENT BUREAU'S INTERROGATORIES TO SAN FRANCISCO UNIFIED
SCHOOL DISTRICT**

The Enforcement Bureau ("Bureau"), pursuant to sections 1.311 and 1.323 of the Commission's rules, submits the following interrogatories to San Francisco Unified School District ("SFUSD"). These interrogatories are to be deemed continuing in character. Thus, SFUSD has an obligation to provide to the Bureau any additional responsive information that may come to its attention subsequent to answering these interrogatories.

Definitions

The following definitions shall control in this pleading:

- a. As used herein, the term "SFUSD" means any person acting on behalf of, or under the direction and control of (including legal counsel), San Francisco Unified School District, San Francisco, California, during the period January 1, 1991, to the present.
- b. The term "application" means the documents related to the renewal request for radio Station KALW(FM), San Francisco, California.
- c. The term "Board" means the San Francisco Board of Education.
- d. The term "station" means noncommercial educational radio Station KALW(FM), San Francisco, California.

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e. The term “document” means handwritten, printed, typed, computerized, or visually or aurally reproduced material of any kind, and means the original (or duplicate original) and any non-identical copies thereof (whether different from the original because of notes made on or attached to such copy or otherwise), drafts or amendments thereof, including, but not limited to, all writings, correspondence, memoranda (including memoranda of oral conversations), minutes, diaries, notes (including notes of meetings), papers, calendars, lists, records of telephone conversations, instructions, guidelines, affidavits, receipts, bills, cancelled checks, agreements, contracts, court orders or any other documentary materials of any nature whatsoever, including computer files, in the possession, custody, or control of SFUSD.

f. The terms “relate to” and “relating to” mean constitutes, contains, embodies, reflects, identifies, states, refers to, deals with, or in any way is pertinent to the specified subject, including documents concerning the preparation of the documents.

g. The term “identify” when used in reference to a person or persons, means to state his/her full name, last known business and residence addresses, and last known business and residence telephone numbers.

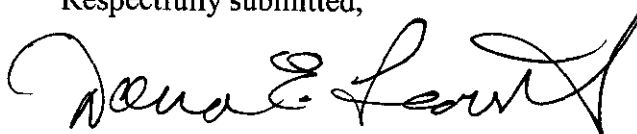
h. The term “identify” when used in reference to a document, means to state the date, author, addressee, type of document (e.g., the types of documents referenced in definition e., above), a brief description of the subject matter, its present or last known location and its custodian. If any such document was, but no longer is, in SFUSD’s possession or control, state the disposition that was made of it, the reason for such disposition, and the date thereof. In lieu of identifying any such document, it may be made available to the Bureau for inspection and copying by so stating in the answer.

Interrogatories

1. Identify all persons whom SFUSD intends to call as witnesses in support of its application.
2. Identify all documents SFUSD intends to submit in support of its application.
3. Identify all persons who are/were employed in a paid position to manage the station during the period January 1, 1991 to the present. Provide the title and a brief description of the duties of each such person identified and state the duration of his or her employment.
4. Identify all persons who served on the Board for each year during the period January 1, 1991 to the present.
5. Identify all persons who prepared or assisted with the preparation of the supplemental ownership reports for the years 1993 and 1995.
6. Identify all persons who filed the supplemental ownership reports with the Commission during the period January 1, 1991 to the present, and state when such reports were filed with the Commission for the supplemental reports required to be filed in 1993 and 1995.
7. Identify all persons who prepared the quarterly issues/program lists due the 10th day after the end of each quarter during the period January 1, 1991 to the present.
8. Identify all persons responsible for maintaining the station's public inspection file during the period January 1, 1991 to the present.
9. Identify all documents that relate to the station's policies and procedures for preparing ownership reports, supplemental ownership reports, and issues/program lists, during the period January 1, 1991 to the present.

10. Identify all documents that relate to the station's policies and procedures for maintaining the station's public inspection file during the period January 1, 1991 to the present.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Dana E. Leavitt". The signature is fluid and cursive, with a large initial "D" and a stylized "L".

William D. Freedman, Deputy Chief
James W. Shook, Special Counsel
Dana E. Leavitt, Special Counsel
Investigations and Hearings Division
Enforcement Bureau

Federal Communications Commission
445 12th Street, S.W., Room 4-C330
Washington, D.C. 20554
(202) 418-1420

August 23, 2004

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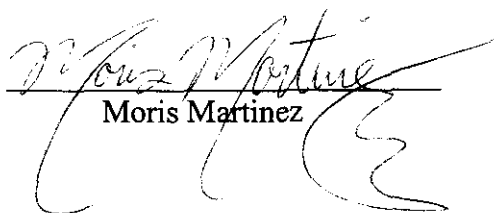
Moris Martinez, a clerk in the Enforcement Bureau's Investigations and Hearings Division, certifies that he has, on this 23th day of August, 2004, sent by first class United States mail, electronic mail (e-mail) or delivered by hand, copies of the foregoing "Enforcement Bureau's Interrogatories to San Francisco Unified School District" to:

Marissa G. Repp, Esq.
Hogan & Hartson L.L.P.
555 Thirteenth Street, N.W.
Washington, D.C. 20004-1109

Louise H. Renne, Esq.
Renne Sloan Holtzman & Sakai, LLP
188 The Embarcadero, Suite 200
San Francisco, CA 94105

Ernest T. Sanchez, Esq.
The Sanchez Law Firm
2300 M Street, N.W., Suite 800
Washington, D.C. 20037

Chief Administrative Law Judge Richard L. Sippel (by hand)
Federal Communications Commission
445 12th Street, S.W., Room 1-C768
Washington, D.C. 20054


Moris Martinez